

filed within a common timeframe. They suggest that comparative hearing procedures should be used to determine which of two co-channel applicants seeking to expand into a common area within a 60-day filing window should be granted. AirTouch Paging and Arch oppose this proposal. Comparative hearing proceedings are costly, time-consuming and the criteria by which conflicting proposals of this nature should be judged are difficult to ascertain. For these reasons, AirTouch Paging and Arch believe that the Commission proposal to use first-come first-served licensing procedures for competing modifications has merit. Considering applications mutually exclusive only if they are filed on the same day will serve to reduce the number of conflicts, which Joint Commenters believe is the proper approach.

Conclusion

41. The foregoing premises having been duly considered, AirTouch Paging and Arch Communications Group respectfully request that the Commission grant the Petitions for Reconsideration to the extent indicated herein.

Respectfully submitted,

ARCH COMMUNICATIONS GROUP



By: Carl W. Northrop
Its Attorney

Bryan Cave
700 13th Street, N.W.
Suite 700
Washington, D.C. 20005

AIRTOUCH PAGING



By: Mark A. Stachiw
Its Attorney

AirTouch Paging
Three Forest Plaza
12221 Merit Drive, Suite 800
Dallas, Texas 75251

January 20, 1995

CERTIFICATE OF SERVICE

I, Carolyn M. Floyd, hereby certify that I have this 20th day of January, 1995, caused copies of the foregoing **Joint Comments of AirTouch Paging and Arch Communications Group on the Petitions for Reconsideration** to be delivered by hand, courier charges prepaid, or by first-class U.S. mail, postage prepaid, to the following:

***Rosalind Allen**
Acting Chief
Commercial Radio Division
Federal Communications Commission
2025 M Street, N.W.
Washington, D.C. 20554

Donald M. Mukai
U.S. West NewVector Group, Inc.
3350 - 161st Avenue, S.E.
Bellevue, WA 98008
Counsel for AirTouch
Communications, Inc.

***David Furth**
Acting Deputy Chief (Legal)
Commercial Radio Division
Federal Communications Commission
2025 M Street, N.W.
Washington, D.C. 20554

Ellen S. Mandell
Pepper & Corazzini, L.L.P.
200 Montgomery Building
1776 K Street, N.W., Suite 200
Washington, D.C. 20006
Counsel for Alpha Express

Kathryn A. Zachem
Kenneth D. Patrich
Wilkinson, Barker, Knauer & Quinn
1735 New York Avenue, N.W.
Washington, D.C. 20006
Counsel for AirTouch
Communications, Inc.

**Dennis Myers, Vice President and
General Counsel**
2000 West Ameritech Center Drive
Location 3H78
Hoffman Estates, IL 60195-5000
Counsel for Ameritech

David A. Gross
Kathleen Q. Abernathy
Airtouch Communications, Inc.
1818 N Street, N.W.
Washington, D.C. 20036
Counsel for AirTouch
Communications, Inc.

Lawrence W. Katz
1710 H Street, N.W.
Washington, D.C. 20006
Counsel for Bell Atlantic

L. Andrew Tollin
Michael Deuel Sullivan
Robert G. Kirk
Wilkinson, Barker, Knauer & Quinn
1735 New York Ave., N.W., Suite 600
Washington, D.C. 20006
Counsel for BellSouth Corporation

William B. Barfield
Jim O. Llewellyn
BellSouth Corporation
1155 Peachtree Street, N.E.
Atlanta, Georgia 30309-3610
Counsel for BellSouth Corporation

Charles P. Featherstun
David G. Richards
BellSouth Corporation
1133 21st Street, N.W.
Washington, D.C. 20036
Counsel for BellSouth Corporation

Timothy J. Fitzgibbon
Thomas F. Bardo
Carter, Ledyard & Milburn
1350 I Street, N.W., Suite 870
Washington, D.C. 20005
Counsel for C-Two-Plus Technology

Thomas J. Casey
Antoinette Cook Bush
David H. Pawlik
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005
Counsel for CCPR

John Mitchell
Cellular Paging Systems, Inc.
2133 West Marshall Street
Richmond, Virginia 23230

Frederick M. Joyce
Christine McLaughlin
Joyce & Jacobs
1019 19th Street, N.W.
Fourteenth Floor
Washington, D.C. 20036
Counsel for Celpage and Metrocall

Gerald S. McGowan
George L. Lyon, Jr.
Lukas, McGowan, Nace & Gutierrez
1111 19th Street, N.W., Suite 1200
Washington, D.C. 20036
Counsel for Dial Page and PCS

David C. Jatlow
Young & Jatlow
2300 N Street, N.W.
Washington, D.C. 20037
Counsel for The Ericsson Corp.

Andre J. Lachance
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036
Counsel for GTE

William A. Doyle
President
InterDigital Communications Corporation
2200 Renaissance Blvd. Suite 105
King of Prussia, PA 19406

M.C. Stephan
5002 Mussetter Road
Ijamsville, Maryland 21754

Harold Mordkofsky
John A. Prendergast
Blooston Mordkofsky Jackson &
Dickens
2120 L Street, N.W.
Washington, D.C. 20037
Counsel for the Part 22 Licensees

Cathleen A. Massey
Senior Regulatory Counsel
McCaw Cellular Communications, Inc.
1150 Connecticut Ave., N.W.
4th Floor
Washington, D.C. 20032

Gene P. Belardi
Vice President and Regulatory
Counsel
2101 Wilson Boulevard
Suite 931
Arlington, Virginia 22201
Counsel for Mobilemedia
Communications

Grier C. Raclin, Esq.
Francis E. Fletcher, Esq.
Anne M. Stamper, Esq.
Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900, East Tower
Washington, D.C. 20005
Counsel for TIA

M.G. Heavener
President
MTC Communications
Box 2171
Gaithersburg, Maryland 20886

Tom A. Lippo, Esq.
FACT Law Group
412 First Street, S.E.
Suite One -- Lobby Level
Washington, D.C. 20003
Counsel for Nokia

Louise Cybulski
Pepper & Corazzini, L.L.P.
200 Montgomery Building
1776 K Street, N.W., Suite 200
Washington, D.C. 20006
Counsel for Pac-West

James F. Rogers
Raymond B. Grochowski
Latham & Watkins
1001 Pennsylvania Avenue, N.W.
Suite 1300
Washington, D.C. 20004
Counsel for Page America

Judith S. Ledger-Roty
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036
Counsel for Paging Network

David L. Hill
Audrey P. Rasmussen
O'Connor & Hannan
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, D.C. 20006
Counsel for Paging Partners and
Source One

Louis Gurman
Andrea S. Miano
Doane F. Kiechel
Jerome K. Blask
Jeanne M. Walsh
Gurman, Kurtis, Blask & Freedman,
Chartered
1400 16th Street, N.W., Suite 500
Washington, D.C. 20036
Counsel for Palouse Paging and Sawtooth
Paging, ProNet and Western Wireless

Mark J. Golden
Personal Communications Industry
Association
1019 19th Street, N.W., Suite 1100
Washington, D.C. 20036

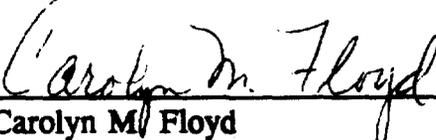
Steve Jones
Sound & Cell
2925 W. Navy Blvd.
Pensacola, FL 32505

Wayne Watts
Vice President and General Attorney
Bruce E. Beard, Esquire
SouthWestern Bell Mobile
Systems, Inc.
17330 Preston Road
Suite 100A
Dallas, TX 75252

Thomas J. Dougherty, Jr.
Francis E. Fletcher, Jr.
Gardner Carton & Douglas
1301 K Street, N.W.
Suite 900, East Tower
Washington, D.C. 20005
Counsel for Sussex Cellular

Carl W. Northrop
E. Ashton Johnson
Bryan Cave
700 Thirteenth Street, N.W.
Suite 700
Washington, D.C. 20005-3970
Counsel for Triad Cellular

CellTek Corporation
4647T Hwy. 280 E., Ste. 260
Birmingham, AL 35242


Carolyn M. Floyd

* Via hand delivery